

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE:

KHALID ABDER ISA a/k/a Khalid Isa,
Debtor.

CASE NO. 16-23617-rdd
CHAPTER 11

X

OPPOSITION TO THE MOTION FOR RELIEF FROM THE AUTOMATIC STAY

_____**COMES NOW** the undersigned debtor-in-possession, and before this
**Honorable Court, most respectfully submits his opposition to the motion for
Relief from the Automatic Stay, based on the following grounds:**

- I. MONTHLY PAYMENT of \$1,800.00 is being sent to PENNY MAC since
the submission of the PLAN OF REORGANIZATION and DISCLOSURE
STATEMENT to the Court up to the present.**
- II. The real property with a house located at 39 Wilcox Avenue,
Yonkers, NY 10705 is the only dwelling place of the debtor and his
mother.**
- III. FLEXIBILITY IN PAYMENT NEGOTIATION:**
**Herein debtor in possession is willing to negotiate for a more
affordable payment arrangement with the mortgage bank and its
current representative.**
- IV. URGENT NEED FOR AN EXPERT PROPERTY APPRAISER FOR A RE-
ASSESSMENT OF THE REAL VALUE OF THE PROPERTY which is**

2019 JUL 25 P 1:48
CLERK OF COURT

currently in deterioration and almost in an uninhabitable condition.

WHEREFORE, IN VIEW OF ALL THE FOREGOING, it is most respectfully prayed that this OPPOSITION TO THE MOTION FOR RELIEF from the Automatic Stay filed by Frankel Lambert Weiss on behalf of PMT NPL Financing 20014-1 be considered by this Honorable Court in favor of the undersigned.

_____**State of New York, July 23, 2018.**



KHALID A. ISA
Debtor-in-Possession

COPY FURNISHED:

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